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8 *Counsel for Plaintiff International Fur Trade Federation*

9 UNITED STATES DISTRICT COURT  
10 NORTHERN DISTRICT OF CALIFORNIA

11 INTERNATIONAL FUR TRADE  
12 FEDERATION, an unincorporated  
13 association;

14 Plaintiff,

15 – against –

16 CITY AND COUNTY OF SAN  
17 FRANCISCO; and

18 DR. GRANT COLFAX, an individual,  
19 in his official capacity as Director of the  
20 San Francisco Department of Public  
21 Health;

22 Defendants.  
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Case No. 3:20-cv-00242-RS

**DECLARATION OF MICHAEL  
TENENBAUM IN SUPPORT OF  
STIPULATION AND  
[PROPOSED] ORDER RE  
BRIEFING AND HEARING  
SCHEDULE ON PENDING  
MOTIONS**

1 I, Michael Tenenbaum, declare as follows:

2 1. I am a lawyer duly licensed in the State of California. I represent the  
3 Plaintiff International Fur Trade Federation (“IFF” or “Plaintiff”) in this action. I have  
4 personal knowledge of the facts set forth in this declaration and could competently  
5 testify to such facts if called upon to do so. So as to avoid the burden on the Court of  
6 multiple declarations, I am filing only this declaration in support of the accompany  
7 Stipulation and Proposed Order, having first shared a draft of it with counsel for  
8 Defendants as well as with counsel for the proposed intervenors and received no  
9 objection to doing so.

10 2. In connection with Defendants’ motion to dismiss and IFF’s intended  
11 cross-motion for summary judgment, I have been conferring with Defendants’ counsel,  
12 both by telephone and through email, over the past several weeks, including about  
13 scheduling issues in light of our pre-existing commitments in other cases as well as  
14 various constraints we face under the current, unusual circumstances, such as the recent  
15 stay-at-home orders issued by San Francisco and by the Governor of California. These  
16 have been highly disruptive to my own productivity (e.g., compelling me to work from  
17 home, where I can only be a fraction as productive as in my office as a result of my  
18 proximity to an eight-month-old), and my understanding is that counsel for Defendants  
19 has faced similar constraints of her own.

20 3. In light of these issues, and for the sake of efficiency for both counsel and  
21 the Court, counsel for the Parties wish to continue the hearing on Defendants’ motion to  
22 dismiss (Dkt. 15) to no sooner than June 4, 2020, to schedule the hearing on IFF’s  
23 intended cross-motion for summary judgment for the same date as Defendants’ motion,  
24 and to reset the existing and default briefing schedules to accommodate counsel’s  
25 scheduling constraints.

26 4. In addition, counsel for Defendants and I share the belief that the case  
27 management conference and prerequisite Rule 26(f) conference of counsel will either  
28 be more productive or will be moot if held after the Court rules on the Parties’

1 potentially dispositive cross-motions.

2       5.       So as to avoid the need for a separate stipulation, counsel for the Parties  
3 have further stipulated with counsel for the two proposed intervenors (The Humane  
4 Society of the United States and Animal Legal Defense Fund) to continue the hearing  
5 on their motion to intervene (Dkt. 12) and to reset the briefing schedule in order to  
6 accommodate counsel's scheduling constraints while at the same time enabling their  
7 motion to be heard on April 30, 2020, so that, in the event that they are permitted to  
8 intervene, their intended motion for judgment on the pleadings may be noticed for  
9 hearing on the same date as the Parties' potentially dispositive cross-motions.

10       6.       The Parties have not previously stipulated, and the Court has not  
11 previously ordered, any time modifications in this case, and the Parties believe that the  
12 requested scheduling will not materially delay the resolution of this case.

13       I declare under penalty of perjury of the laws of the United States that the  
14 foregoing is true and correct.

15 Dated: March 23, 2020

/s/ Michael Tenenbaum

Michael Tenenbaum